

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UMAR HASSAN BURLEY, *et al.*,**

\*

**Plaintiffs,**

\*

**v.**

\*

**Civil No.: 1:18-cv-01743-SAG**

**BALTIMORE CITY  
POLICE DEPARTMENT, *et al.*,**

\*

\*

**Defendants.**

\*   \*   \*   \*   \*   \*   \*   \*   \*   \*   \*   \*

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO  
DEPOSE INCARCERATED DEFENDANT**

COMES NOW Plaintiffs Umar Burley and Brent Matthews, by and through undersigned counsel, who hereby move the Court for leave to depose Defendant Wayne Jenkins, who is presently incarcerated in Edgefield, South Carolina at FCI Edgefield pursuant to Rule 30(a)(2)(B). Because Mr. Jenkins is incarcerated, Rule 30(a)(2)(B) requires Plaintiffs to seek leave to depose him. Plaintiffs are entitled to depose Mr. Jenkins, who is a defendant in this case, and the deposition is necessary and relevant to the Plaintiffs' action. Plaintiffs have arranged with the prison staff to depose Mr. Jenkins at his corrections facility by telephone, so he will not need to be transferred or otherwise travel and the facility will not need to accommodate outside visitors. Mr. Jenkins will suffer no injury or other prejudice by giving deposition testimony like any other party to civil litigation. Counselor Johnson at FCI Edgefield confirmed to undersigned counsel that the date selected is available. All counsel have selected July 10, 2020, at 10:00 a.m. for the telephonic deposition.

WHEREFORE, Plaintiffs respectfully request the Court grant it leave to depose Defendant Jenkins.

Dated: May 29, 2020

Respectfully submitted,

/s/

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/s/

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*Attorneys for Plaintiffs Umar Hassan Burley and  
Brent Andre Matthews*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 29, 2020, a copy of the foregoing was electronically filed via CM/ECF, with notice to all counsel.

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/s/  
William N. Sinclair